

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

**FILED**

OCT 27 2014

Phil Lombardi, Clerk  
U.S. DISTRICT COURT

(1) Plaintiff(s)  
**Marc O. Howell**

vs.

Case Number:

(2) Defendant(s) **14 CV - 647 GKF - TLW**  
**Farmers Insurance Company**

**COMPLAINT**

**A. Parties**

- 1) Marc DeWayne Howell, is a citizen of Oklahoma  
(Plaintiff) (State)  
who presently resides at 202 East Marshall Place  
(mailing address if different from residence)
- 2) Defendant Farmers Insurance Co. is a citizen of Tulsa, Oklahoma  
(Name of first defendant) (City, State)  
and is employed as a commercial insurance sales company  
(Position and title, if any)
- 3) Defendant \_\_\_\_\_ is a citizen of \_\_\_\_\_  
(Name of second defendant) (City, State)  
and is employed as \_\_\_\_\_  
(Position and title, if any)

[You may attach additional pages (8½" x 11") to furnish the above information for additional defendants.]

**B. Jurisdiction**

- 1) Jurisdiction is asserted pursuant to: Oklahoma Code Title 76, numbers 761, 762, 763.  
Title 18, U.S.C., section 245; 18 U.S.C. - 1001  
Title 21 U.S.C. - 1983; 42 U.S.C. - 1983

**C. Nature of Case**

- 1) Briefly state the background of your case: After my job position at West Business Solutions was discontinued and terminated on 2/23/2014, I applied for call center employment with several online job referral services. I was the victim of intentional harassment at West Business Solutions, that was related to my problems with a U.S. District Court case in Texas, being disabled while homeless, being denied Social Security supplemental disability benefits twice and my being the victim of housing discrimination and medical malpractice. In July of 2014, I received an invitation via telephone call from Ernesto at Farmers Insurance, inviting me in for an interview at the 91st and Memorial Farmer's location in Tulsa, OK.

**D. Cause of Action**

I allege the following:

1. Personal injury; willfull deceit; the making of false statements and harassment.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

while I was speaking with Ernesto over the initial telephone call and scheduling of the first interview, he blurted out and mumbled the word "donation" out of the context of the subject matter of our conversation. I did not respond to his mentioning of the word, "donation". Some of the supervisors and employees at West Business Solutions knew that I had sought charity financial help from public and private sources in the fall of 2013 and winter of 2014.

2. I interviewed in person with a Farmer's Insurance company manager in July of 2014 and he told me that the company was looking to hire me for a part time customer service/sale position at \$14.00 - \$19.00 an hour. I told this interviewer that the work schedule and pay rate would work very well for me because it would enable me to pay for an apartment where I would have the time and place to work on my current legal paperwork.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

The interviewer/manager then told me that he was going to forward my name and resume to the other Tulsa, OK. area Farmer's locations and that someone would call me via telephone call for the next step in the hiring process. NO ONE from Farmer's Insurance ever called me or left me a voicemail message.

3. I then called Ernesto back after two weeks and I informed him that I had not received any telephone calls like were asserted to me by the manager/interviewer. Ernesto received at least three messages and telephone calls from me, in which I inquired about the job positions. Ernesto told me that the manager did not have a voicemail that I could leave a message at.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

NO ONE from Farmer's insurance ever contacted me by telephone to inform me that the position had been filled by someone else or that it was no longer available.

[If necessary, you may attach additional pages (8½" x 11") to explain any allegation or to list additional supporting facts in the same format as above.]

#### E. Request for Relief

I believe that I am entitled to the following relief:

250,000 dollars

Man Howell

Original Signature of Plaintiff

202 East Marshall Place

Current Address

Tulsa, Oklahoma 74106

City

State

ZIP

(918) 904-4473

Telephone